

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

15 West Broadway, Suite 425
San Diego, CA 90802-4444

(310) 590-4868



May 10, 1995

1995 MAY 26 AM 9:20

Ms. Content Garriga
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5181

Dear Ms. Garriga:

**COMMENTS TO DRAFT WORKPLAN, FOCUSED SITE INSPECTION, NAVAL
TRAINING CENTER, SAN DIEGO - SITES 5 AND 6**

The Department of Toxic Substances Control (DTSC) has completed its review of the subject document. Enclosed are DTSC and Regional Water Quality Control Board, San Diego comments. Please incorporate these comments accordingly into the final workplan.

If you have any questions regarding this matter, please call me at (310) 590-5563.

Sincerely,

Alice Gimeno
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

cc: Mr. Corey Walsh
Hazardous Waste Management Division
California Regional Water Quality Control Board
San Diego Region
9771 Clairemont Mesa Boulevard, Suite B
San Diego, California 92124-1331



Ms. Content Garriga
Comments to Draft WP-Focused SI, Sites 5&6, NTC
May 10, 1995
Page 2

Ms. Claire Trombadore
U.S. Environmental Protection Agency
Region IX, H-9-2
Hazardous Waste Management Division
75 Hawthorne Street
San Francisco, California 94105

Ms. Vickie Church
County of San Diego
Department of Health Services
Site Assessment and Mitigation
P.O. Box 85261
San Diego, California 92186-5261

Mr. Phillip Dyck
BRAC Environmental Coordinator (BEC)
Naval Training Center
33502 Decatur Road, Suite 120
San Diego, California 92133-1449

**COMMENTS TO DRAFT WORKPLAN, FOCUSED SITE INSPECTION,
NAVAL TRAINING CENTER, SAN DIEGO - SITES 5 AND 6**

GENERAL COMMENTS

1. Please provide a health and safety plan for the planned field activities at Sites 5 and 6.
2. Please clarify text when referencing USTs, ASTs, sumps, or oil/water separators to state if they are currently existing or not.

SPECIFIC COMMENTS

1. **Page 1-7, Section 1.3.1, second paragraph:**

Please include reference to the source used for obtaining underground storage tanks (USTs) information.

2. **Page 1-18, Section 1.3.2, second paragraph:**

Please clarify that pesticide container washout was poured onto soil and grassy areas adjacent to Building 516.

3. **Page 2-2, first paragraph, last sentence:**

Please be more specific with the reference, RWQCB 1975.

4. **Page 3-1, Section 3.1.3, Permitting for Fieldwork:**

Permits are not required for on-site activities however the substantive provisions of applicable state laws and regulations must be met to assure all activities are protective of human health and the environment.

5. **Pages 3-3 and 3-4, Section 3.2.1.2, Sample Analysis and Validation:**

Please include pesticide analysis for Site 6. How was 500 mg/kg determined as a TPH cut-off limit? Please include in text.

6. **Page 4-1, Project Schedule:**

Is the Final FSI Report supposed to be 11/19/95 not 11/19/96?

7. **Page A3-1, Section 3, Sample Location and Frequency:**

Please provide all SOPs used for this FSI.

Page A3-1, Sites 5 and 6 Soil Sampling:

Please provide rationale for background sampling locations and numbers of samples. Please see Section 2.4.2.5 "*Background Sampling*" of the Department's January 1994 Preliminary Endangerment Assessment Guidance Manual.

8. **Page A3-5, Third Paragraph, paragraph before Section 3.2:**

Please delete this paragraph. The five foot depth for Site 5 is not necessarily adequate. Sampling depths should be located beneath the UST's which will vary from different UST locations. Individual samples should be taken where contamination is observed, where information from direct reading instruments indicate possible contamination, and from the capillary fringe if possible.

9. **Page A3-13, Section 3.4, Sample Location Rationale:**

Sampling locations should be beneath the bottoms of the USTs, where contamination is likely to be found.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

9771 CLAIREMONT MESA BOULEVARD, SUITE B
SAN DIEGO, CA 92124-1331
TELEPHONE: (619) 467-2952

FAX: (619) 571-6972

**MEMORANDUM**

TO: Ms. Alice Gimeno
California Environmental Protection Agency
Department of Toxics Substances Control
Office of Military Facilities, Region 4
245 West Broadway, Suite 425
Long Beach, CA 90802-4444

FROM: Mr. Corey Walsh
California Regional Water Quality Control Board
San Diego Region, (9)
9771 Clairemont Mesa Boulevard, Suite B
San Diego, CA 92124-1331

DATE: May 8, 1995

SUBJECT: Comments on draft document for Sites 5 & 6 entitled:
*Draft Work Plan Focused Site Inspection, Naval Training
Center, San Diego, California*

INTRODUCTION

Staff have reviewed the *Draft Work Plan Focused Site Inspection* report and Attachment A, *Draft Field Sampling Plan*, for Sites 5 & 6, (Former Firefighter Training School & Golf Course Maintenance Shop) dated February, 15 1995. The Work Plan document was prepared by Bechtel National, Inc. for Southwest Division Naval Facilities Engineering Command in accordance with CTO-0046.

GENERAL COMMENTS

The Work Plan does not identify whether USTs located at the Former Firefighter Training School (Site 5) have been removed nor any means to verify if USTs and associated piping have been removed. The Work Plan must include some sort of geophysical screening of site to verify that USTs and associated piping have been removed. This may also aid in locating soil and groundwater sampling points.

Hydropunch™ sample locations at this site should be used to assist in the assessment of groundwater contamination and placement of permanent groundwater monitoring wells.

SPECIFIC COMMENTS
WORK PLAN

1 Page 1-7, section 1.3.1. Does the concrete storm water

channel which collected effluent from Site 5 still exist, and is it located as described on Figure 1-3 Site Plan.

- 2 Figure 1-3 Site Plan. Are boxes shown near the west end of the concrete storm water channel collection points for Site 5 discharge to storm water channel? Are there any other discharge points to storm water channel?
- 3 Page 1-17, section 1.3.1.5. Is this paragraph correct? Did suction sumps collect waste water from site? Did suction sumps discharge into the oil water separator, directly to the Boat Channel or directly to storm water channel as indicated in section 1.3.1.5?
- 4 Page 2-1, section 2.3. What is the estimated depth to groundwater for both Site 5 & 6 and the basis for the estimation? What variation in groundwater elevation occur at each of these sites, i.e. tidal or seasonal fluctuations?
- 5 Page 3-2, section 3.2.1.1, Subsurface Soil Investigation. Paragraph should address the issue of soil samples being collected at significant lithologic changes or as necessary based on field observations. Why is hand auger being used for this investigation (field mobilization twice)? Site 5 soil samples must also be collected down into the capillary fringe and saturated zone in order to delineate any smear zone caused by groundwater table fluctuations. How will these borings be destroyed?
- 6 Page 3-3, section 3.2.1.1, In Situ Groundwater Investigation. Without specific information on depth to groundwater the Hydropunch™ sample point may not be appropriate. Depending on geologic conditions the Hydropunch™ method may not be appropriate to determine the presence of free phase hydrocarbon. Provide the rationale for sample depth of 20 feet bgs at both Sites 5 & 6? This would appear to be too deep for Site 5 and too shallow for Site 6. Additional groundwater monitoring data is required adjacent to gasoline USTs and oil water separator tank.
- 7 Page 3-3, section 3.2.1.1, Surface Sediment Sampling of San Diego Bay. Due to the age of the suspected release (1942 to 1968) surface sediment samples provided by the Van Veen (1/10 sq. meter) grab sampler may not be adequate to identify or characterize the vertical extent of contamination.
- 8 Page 3-3, section 3.2.1.2. Groundwater sample analysis for Site 5 must also include EPA Method 8020 (BTEX) and EPA Method 8015 must be modified for both gasoline and diesel. Can EPA Method 8015 be modified for the appropriate "fuel oil" used at the site? If not TRPH method 418.1 may also be

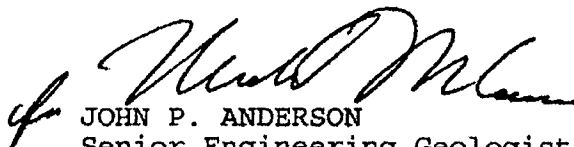
required.

FIELD SAMPLING PLAN

- 1 Page A3-1, section 3.1.1. Reportedly direct discharges from the suction sumps and oil water separator to the concrete drainage storm water channel has occurred. Provide sample location rational for assessing possible release associated with concrete drainage storm water channel.
- 2 Figure A3-1, Proposed Sampling Locations (Site 5). Identify structures 401 and 402 adjacent to AST along west side of site. Indicate the aboveground diesel storage tank location. Was there a discharge point from Pump Dock #3?
- 3 Page A3-5, section 3.1.2. Delete or rewrite paragraph 3; staff does not concur with this statement.
- 4 Page A3-5, section 3.2. Permanent monitoring wells must be installed to verify the Hydropunch™ sample data? How will the Hydropunch™ exploration holes be destroyed? These exploration holes must be destroyed per California Well Standards Bulletin 74-90 (Supplement to Bulletin 74-81). Include content of appropriate SOP.
- 5 Page A3-5, section 3.2. What is the screen length of the Hydropunch™? Exactly where will the screened interval be placed relative to the saturated zone?
- 6 Page A3-9, section 3.2.1. How close to the original USTs and other structures will sample locations be placed? Based on what information will these sample locations be placed?
- 7 Page A3-13, section 3.4. Inadequate soil and Hydropunch™ sample location rational.

If you have any questions concerning this memorandum, please contact Corey Walsh at (619) 467-2980.

Sincerely,


JOHN P. ANDERSON
Senior Engineering Geologist
Site Mitigation & Cleanup Unit

cc: Ms. Claire Trombadore
U.S. EPA (H-9-2)
75 Hawthorne Street
San Francisco, CA 94105-3901